

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION  
THIS DOCUMENT RELATES TO:**

**MDL 2804**

**Case No. 1:17-md-2804**

*Track 14: City of Independence, Missouri v.  
Williams, Case No. 19-op-45371*

**Judge Dan Aaron Polster**

*Track 15: County of Webb, Texas v. Purdue  
Pharma, L.P., Case No. 18-op-45175*

**CERTAIN DEFENDANTS' MOTION TO DISMISS FOR  
LACK OF PERSONAL JURISDICTION**

Pursuant to Federal Rule of Civil Procedure 12(b)(2), Defendants UnitedHealth Group Incorporated, Optum, Inc., OptumInsight, Inc., OptumInsight Life Sciences, Inc., OptumRx Discount Card Services, LLC, Optum Perks, LLC, OptumHealth Care Solutions, LLC, OptumHealth Holdings, LLC, and Optum Health Networks, Inc. move to dismiss Plaintiff the City of Independence's and Plaintiff Webb County's Amended Complaints (Dkts. 5296-4 and 5296-5) for lack of personal jurisdiction.

Dated: May 20, 2024

Respectfully submitted,

/s/ Brian D. Boone

Brian D. Boone

Emily C. McGowan

Brandon C.E. Springer

**ALSTON & BIRD LLP**

Vantage South End

1120 South Tryon Street, Suite 300

Charlotte, NC 28203

Tel: (704) 444-1000

brian.boone@alston.com

emily.mcgowan@alston.com

brandon.springer@alston.com

William H. Jordan  
D. Andrew Hatchett  
Bradley Harder  
Caroline R. Strumph  
**ALSTON & BIRD LLP**  
1201 West Peachtree Street NW  
Suite 4900  
Atlanta, GA 30309  
Tel.: (404) 881-7000  
bill.jordan@alston.com  
andrew.hatchett.com  
bradley.harder.com  
caroline.strumph.com

*Attorneys for OptumRx, Inc., UnitedHealth  
Group Incorporated, Optum, Inc.,  
OptumInsight, Inc., OptumInsight Life  
Sciences, Inc., OptumRx Discount Card  
Services, LLC, Optum Perks, LLC,  
OptumHealth Care Solutions, LLC,  
OptumHealth Holdings, LLC, and Optum  
Health Networks, Inc.*